

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-28 through 32]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 8, 2011

Respectfully submitted,

N20111D28

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-28 Assume the scenario where Post Office A is discontinued or consolidated and its delivery functions [post office box and carrier delivery, if any] are transferred to Post Office B such that the customer will utilize a post office box physically located at Post Office B or be served by a delivery carrier on a route now originating at Post Office B. Further assume that the customer's original address had a last line of "Town A, NJ 07688".

[a] Please advise whether it will be possible for the customer to maintain their same address that they had before the discontinuance or consolidation of Post Office A, namely a last line of "Town A NJ 07688" and also maintain the rest of the address the same. The processing plant will be programmed to send mail addressed to Town A NJ 07688 physically to Post Office B [ZIP Code 07633] where employees of Post Office B will place this mail in the box section for the transferred customers as well as having the carriers deliver the mail on routes originating at Post Office B.

[b] If so, will the Postal Service utilize this procedure of making the change transparent to the customers of Post Office A?

[c] If not, why not?

DBP/USPS-29 Please refer to your attached chart in response to Interrogatories DBP/USPS-6 through 8.

[a] Please confirm, or explain if you are unable to confirm, that the BRICK & MORTAR / RETAIL COUNTER column applies to all independent post offices and classified stations/branches and only to this type of facility.

[b] Please advise the types of facilities that are included in the BRICK & MORTAR / CONTRACT POSTAL CENTER column.

[c] If all of the Alternate Access Sites are not included in the Contract Postal Center column, please provide the similar data for each of the types of Alternate Access Sites.

DBP/USPS-30 Please refer to your attached chart in response to Interrogatory DBP/USPS-13.

[a] Please explain why mailers who utilize a Permit Imprint and/or Precancelled Stamps are not counted in the revenue figure while mailers who make a similar mailing and pay the postage with a postage meter are counted.

[b] Please explain why mailers who pay for Express Mail with a corporate account are not counted in the revenue figure while mailers who make a similar mailing and pay the postage with a postage meter or over the retail counter are counted.

[c] Please explain why mailers who pay for their Post Office Box rent at an APC or at usps.com are not counted in the revenue figure while mailers who pay their rent over the retail counter are counted.

[d] Please explain why mailers who pay for their mailing at an APC are not counted in the revenue figure while mailers who pay for the same mailing over the retail counter are counted.

DBP/USPS-31 Please refer to your response to Interrogatory DBP/USPS-15. Please provide the specific section of USPS Handbook PO-101 that specifies the

number of Alternate Access Sites that are to be considered in the determination of including a facility for evaluation.

DBP/USPS-32 Please refer to your attached chart in response to Interrogatory DBP/USPS-16.

[a] Please advise the national policy as to whether a specific facility should or should not provide retail window service on Saturdays.

[b] Evaluation of the chart shows a variation of Saturday retail window service ranging between 23-percent and 99-percent. Please explain why there is such a wide disparity between the different districts.